

SAFETY WRITING THROUGHOUT PRODUCT LIFECYCLE

**High-quality safety
documents to fulfill global
regulatory requirements**



**Clinical
development
phase**

Safety Management Plan

ASR

Annual Safety Report

**Marketing
authorisation
preparation**

RMP

Risk Management Plan

**Post- Marketing
phase**

PSUR/PBRER

Periodic Safety Update Report
Periodic Risk Benefit Evaluation Report

ACO

Addendum to the Clinical Overview
Clinical Expert Statement

Signal detection report

Any Update of RMP

**Any other safety report
requested by authorities**



Clinical development & preparation for Marketing Authorisation



- CDP** Clinical Development Plan
- CIP** Clinical Investigation Plan
- CIR** Clinical Investigation Report
- RMP** Risk Management Plan / Risk Evaluation

- CEP** Clinical Evaluation Plan
- CER** Clinical Evaluation Report
- PMS plan** Post Market Surveillance Plan
- PMCF plan** Post-Market Clinical Follow-up Plan



- PMS report** (Class I devices)
- PSUR** Periodic Safety Update Report (class II and class III devices)
- PMCF report** Post Market Clinical Follow up Report
- SSCP** Safety Summary and Clinical Procedures (class IIb implantable and class III devices)
- RMP, CER and Plans updates** (PMS/ PMCF plans, CEP....)

Post Marketing phase



Safety Reports

Clinical Development Phase

	Medicinal Products	Medical Devices
Type of report	Annual Safety Report (ASR)	Clinical Investigation Report
Frequency of preparation	Annually	< 1 year of the end of the clinical investigation < 3 months of the early termination or temporary halt
Regulation/ Guidelines	Regulation (EU) 536/2014	Regulation (EU) 2017/745
Content and Format	<u>ICH E2F guideline</u> on development safety update report	<u>Commission Guidance</u> on the content and structure of the summary of the investigation report (<u>2023/C 163/06</u>).
Submission	< 60 calendar days after DLP Submission through à Clinical Trials Information System (CTIS)	Submission through EUDAMED (when fully functional) In the meantime, submission via the respective national procedures, if applicable

Safety Reports

Post-marketing Phase

	Medicinal Products	Medical Devices
Type of report	Periodic Safety Update Report (PSUR)	Periodic Safety Update Report (PSUR)
Frequency of preparation	<ul style="list-style-type: none"> • According to the EURD list. • According to the condition laid down in the MA. • Standard submission schedule: • Product not marketed à every 6 months since the product is authorized • Product marketed à every 6 months for 2 years, then once a year for the following 2 years and thereafter every 3 years • At Competent Authority request 	<ul style="list-style-type: none"> • Class IIa: every 2 years • Class IIb: every year • Class III: every year
Regulation/ Guidelines	Regulation (EC) No 726/2004, Directive 2001/83/EC, Commission Implementing Regulation (EU) No 520/2012	Regulation (EU) 2017/745
Content and Format	Guideline on Good Pharmacovigilance Practices (GVP) <u>Module VII – Periodic Safety Update Report</u>	<u>MDCG 2022-21</u> Guidance on Periodic Safety Update Report (PSUR) according to <u>Regulation (EU) 2017/745</u>
Submission	<ul style="list-style-type: none"> • PSUR up to 12 months: < 70 calendar days after DLP • PSUR beyond 12 months: < 90 calendar days after DLP • At Competent Authority request: generally specified; otherwise, < 90 days after DLP • Submission through PSUR repository. 	<ul style="list-style-type: none"> • Class III, Class IIa/IIb implantable: < 90 calendar days after DLP. Submission through EUDAMED (when fully functional). In the meantime, PSUR shall be available upon request. • No submission is required for Class IIa and Class IIb non-implantable. PSUR shall be available upon request.